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11 PRECISION VALVE & AUTOMATION, INC.

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13
14 UNITED STATES DISTRICT COURT
15 CENTRAL DISTRICT OF CALIFORNIA

16 RUBEN JUAREZ an individual and ISELA) CASE NO. 2:17-cv-03342 ODS (GJS)
17 HERNANDEZ, an individual,)
18 Plaintiffs,) **FURTHER RESPONSE TO ORDER**
19 v.) **TO SHOW CAUSE DATED**
20 PRECISION VALVE & AUTOMATION,) **FEBRUARY 4, 2019 (ECF No. 86)**
21 INC., a corporation and DOES 1-20,)
22 Defendants.)
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1 TO THE HONORABLE COURT:

2 Defendant provides the following FURTHER response to this Court's Order To Show
3 Cause dated February 4, 2019. This FURTHER response is given in view of this Court's
4 continued OSC hearing.

- 5 1. As noted previously, the parties signed a binding settlement agreement at a
6 mediation held on January 3, 2019. Ruben Juarez, Isela Hernandez and their
7 attorney, Daniel Balaban, and Defendants' attorney, Alex P. Catalona, signed this
8 agreement.
- 9 2. A redacted version of this agreement was previously provided to the Court.
- 10 3. The formal settlement paperwork was recently revised on May 8, 2019 based on
11 considerations of plaintiff Ruben Juarez's workers' compensation attorneys given
12 pending settlement discussions in that case.
- 13 4. Plaintiff attorneys recently provided signed settlement paperwork to defense
14 counsel but some documents remain to be signed and the settlement amount must be
15 paid before the case can be dismissed.
- 16 5. Defendant requests that the Court permit the parties an additional 60 days to file a
17 stipulation of dismissal in this Court.

18 Respectfully submitted,

19 Dated: July 31, 2019

BECHERER KANNETT & SCHWEITZER

21 By: /s/Alex P. Catalona
22 Shahrad Milanfar
23 Alex P. Catalona
Attorneys for Defendant
PRECISION VALVE & AUTOMATION, INC.

24
25 Dated: July 31, 2019

BALABAN & SPIELBERGER, LLC

26 By: /s/Daniel Balaban
27 Daniel Balaban
28 Attorneys for Plaintiffs
RUBEN JUAREZ and ISELA HERNANDEZ

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6 Attorneys for Defendant
7 PRECISION VALVE & AUTOMATION, INC.

8 UNITED STATES DISTRICT COURT

9 CENTRAL DISTRICT OF CALIFORNIA

10 RUBEN JUAREZ an individual and ISELA) CASE NO. 2:17-cv-03342 ODW (GJS)
11 HERNANDEZ, an individual,)
12 Plaintiffs,) [Los Angeles County Superior Court
13 v.) Case No. BC650229]
14 PRECISION VALVE & AUTOMATION,)
15 INC., a corporation and DOES 1-20,)
16 Defendants.)

17 I, Jerry M. Dumla, declare that I am employed in the County of Alameda, State of
18 California; I am over the age of eighteen (18) years and not a party to the within entitled action;
my business address is 1255 Powell Street, Emeryville, California 94608.
19 On July 31, 2019, I caused to be served the foregoing:
20 **FURTHER RESPONSE TO ORDER TO SHOW CAUSE DATED FEBRUARY 4,**
21 **2019 (ECF No. 86)**
22 In said action by placing a true copy thereof enclosed in a sealed envelope and served in
the manner and/or manners described below to each of the parties herein and addressed as
23 follows:
24 *Attorneys for Plaintiff* Teresa Li, Esq.
25 LAW OFFICES OF TERESA LI, PC
26 5674 Stoneridge Drive, Suite 107
27 Pleasanton, CA 94588
Telephone: (415) 423-3377
Facsimile: (888) 646-5493
Email: teresa@lawofficesofteresali.com

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Attorneys for Plaintiff

Vanessa Loftus-Brewer, Esq.
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11999 San Vicente Blvd., Suite 345
Los Angeles, CA 90049
Telephone: (424) 832-7677
Facsimile: (424) 832-7702
Email: vanessa@dbaslaw.com

(By Mail) I deposited such envelope with postage thereon fully prepaid to be placed in the United States Mail at Emeryville, California. I am familiar with the mail collection practices of Becherer Kannett & Schweitzer Attorneys and pursuant to those practices the envelope would be deposited with the United States Postal Service the same day.

(By Personal Delivery) I caused such envelope to be delivered by hand to the office of the addressee(s).

(Via Facsimile) I caused said document(s) to be transmitted to the facsimile number(s) of the addressee(s) designated.

(Via Electronic Mail) I caused said document(s) to be transmitted to the addressee(s).

(Electronic Filing) I am familiar with the United States District Court, Eastern District of California's practice for collecting and processing electronic filings. Under that practice, documents are electronically filed with the court. The CM/ECF system will generate a Notice of Electronic Filing (NEF) to the filing party, the assigned judge, and any registered users in the case. The NEF will constitute service of the document.

Executed on July 31, 2019.

J Miles

Jerry M. Dumlaو

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Schweitzer**

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